Howard Marc Spector TBA #00785023 Nathan M. Johnson TBA #00787779 SPECTOR & JOHNSON, PLLC 12770 Coit Road, Suite 1100 Dallas, Texas 75251 (214) 365-5377 FAX: (214) 237-3380

## ATTORNEY FOR THE DEBTOR

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	
	§	
Amy Goldblatt Howard	§	Case No. 09-35705-SGJ-13
	§	
Debtor.	§	(Chapter 13)

RESPONSE TO MOTION OF PNC MORTGAGE, A DIVISION OF PNC BANK, N.A. SUCCESSOR TO NATIONAL CITY BANK ITS ASSIGNS AND/OR SUCCESSORS IN INTEREST FOR RELIEF FROM STAY OF ACTION AGAINST DEBTOR(S) PURSUANT TO 11 U.S.C. § 362(a) AND WAIVER OF THIRTY DAY REQUIREMENT PURSUANT TO § 362(e)

Amy Goldblatt Howard (the "Debtor"), by and through her undersigned counsel, hereby files this Response (the "Response") to the Motion (the "Motion") for Relief from Stay of Action Against Debtor(s) Pursuant to 11 U.S.C. § 362(a) and Waiver of Thirty Day Requirement Pursuant to § 362(e) (the "Movant"). In support of this Response, the Debtor states:

- 1. The Debtor admits the allegations contained in Paragraph 1 of the Motion.
- 2. The Debtor admits the allegations contained in Paragraph 2 of the Motion.
- 3. The Debtor admits the allegations contained in Paragraph 3 of the Motion.
- 4. The Debtor admits the allegations contained in Paragraph 4 of the Motion.
- 5. The Debtor admits the allegations contained in Paragraph 5 of the Motion.
- 6. The Debtor admits the allegations contained in Paragraph 6 of the Motion.

- 7. The Debtor admits the allegations contained in Paragraph 7 of the Motion.
- 8. The Debtor admits the allegations contained in Paragraph 8 of the Motion.
- 9. The Debtor denies the allegations contained in Paragraph 9 of the Motion.
- 10. The Debtor denies the allegations contained in Paragraph 10 of the Motion.
- 11. The Debtor denies the allegations contained in Paragraph 11 of the Motion.
- 12. The Debtor denies the allegations contained in Paragraph 12 of the Motion.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that the Motion be denied, and that the Debtor be granted all other relief as justice may require.

Dated: December 15, 2009.

Respectfully submitted,

By: /s/ Howard Marc Spector
Howard Marc Spector
TBA #00785023
Nathan M. Johnson
TBA #00787779

SPECTOR & JOHNSON, PLLC Banner Place, Suite 1100 12770 Coit Road Dallas, Texas 75251 (214) 365-5377 FAX: (214) 237-3380

ATTORNEY FOR THE DEBTOR

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 15, 2009 a true and correct copy of the foregoing was served upon the parties listed below via regular mail or electronic means.

/s/ Howard Marc Spector
Howard Marc Spector